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Attorneys for Secured Creditor and Plan Proponent,
POPPY BANK, fka First Community Bank

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

In re:

HANSABEN INVESTMENTS, LLC, a
California Limited Liability Company,

Debtor in Possession.

Case No. 22-30258 (Lead) DM
Jointly Administered
Chapter 11

**DECLARATION OF LISA MILLS IN
SUPPORT OF SECURED CREDITOR
POPPY BANK'S FIRST AMENDED
CHAPTER 11 PLAN DATED
DECEMBER 14, 2022**

Date: January 27, 2023
Time: 10:30 a.m.
Dept.: Judge Montail Courtroom-Remote

In re:

PRITHVI INVESTMENTS, LLC, a
California Limited Liability Company,

Debtor.

CASE NO.: 22-30259

In re:

RUDRA INVESTMENTS, LLC,

Debtor and Debtor in Possession.

CASE NO.: 22-30275

Hon. Dennis Montali

- ☐ Affects All Three Debtors in Possession
☒ Affects Hansaben Investments, LLC Only
☐ Affects Prithvi Investments, LLC Only
☐ Affects Rudra Investments, LLC Only

1 I, Lisa Mills, declare as follows:

2 1. I am vice-president and special assets manager at Poppy Bank. I submit this
3 declaration in support of Poppy Bank's First Amended Chapter 11 Plan Dated December 14,
4 2022 ("Plan"). If called as a witness, I could and would truthfully testify to the following based
5 on my personal knowledge.

6 2. I am one of the custodians of the books, records and files of Poppy Bank that
7 pertain to loans and extensions of credit given to Debtor concerning the real property located at
8 316 Pitman Road, Fairfield, California ("Subject Property"). I have personally worked on the
9 books, records and files, and as to the following facts, I know them to be true of my own
10 knowledge or I have gained knowledge of them from the business records of Poppy Bank. I am
11 the person at Poppy Bank with day to day responsibility for interfacing with Poppy Bank's
12 counsel in this Bankruptcy case. In my position as vice president and special assets manager, I
13 am duly authorized by Poppy Bank to confirm Poppy Bank's financial ability and willingness to
14 make the payments required of it in the Plan, in the amounts due, and in a timely fashion.

15 3. It is my understanding that, under the Plan, the following payments are due as of
16 the Effective Date of plan confirmation (which is defined in the Plan as "...the fifteenth (15th)
17 day following the Confirmation Date so long as the Order of Confirmation is not subject to a
18 stay"):

19 (a) Payment to Bachecki, Crom & Co., LLP (Debtor's accountants) in the amount of
20 \$27,531.10, per Article 4.1 of the Plan, and consistent with the accountant's
21 Amended Final Application (Docket #144). This amount is net of the \$9,000 retainer
22 funds that will be used to pay this Allowed Administrative Claim.

23 (b) Payment to Felderstein, Fitzgerald, Willoughby, Pascuzzi & Rios, LLP (Debtor's
24 counsel) in the amount of \$41,315.27, per Article 4.1 of the Plan, and consistent with
25 Debtor's counsel's Case Hearing Status Report (Docket #143). This amount is net of
26 the \$20,000 retainer funds that will be used to pay this Allowed Administrative
27 Claim.
28

(c) Payment by Poppy Bank into the Plan Distribution Account, for ultimate payment as of the Effective Date, to the General Unsecured Creditors in the aggregate amount of \$50,000, per Article 5.3 of the Plan. The breakdown among the General Unsecured Creditors is set forth in Article 2.3 of the Plan.

(d) Payment to La Quinta Franchising LLC (Debtor's franchisor) in the amount of \$50,000 as the initial "down payment" of the total cure amount of \$188,813.85, per Article 7.2 of the Plan.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on January 26, 2023 in Santa Rosa, California.

By: /s/ Lisa Mills

Lisa Mills